

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

CR 220 050

UNITED STATES OF AMERICA

) INDICTMENT NO. _____

)

v.

) 18 U.S.C. § 1589(b)

) Forced Labor

AURELIO MEDINA

)

) Forfeiture Allegation

)

THE GRAND JURY CHARGES THAT:

COUNT ONE

Forced Labor

18 U.S.C. § 1589(b)

Beginning at a time unknown to the Grand Jury, but at least from on or about April 9, 2020, and continuing through the return date of this Indictment, the precise dates being unknown, in Glynn County and Effingham County, within the Southern District of Georgia, and elsewhere, the defendant AURELIO MEDINA, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly financially benefit from participation in a venture which has engaged in the providing and obtaining of labor and services by unlawfully charging foreign workers to obtain an H-2A visa and unlawfully withholding their identification documents, by means of the abuse and threatened abuse of law and legal process and by means of a scheme, plan, and pattern intended to cause John Doe #1 to believe that, if John Doe #1 did not perform such labor and services, that John Doe #1 would suffer serious harm or physical restraint.

All done in violation of Title 18, United States Code, Sections 2, 1589(b).

CLERK *JL*
U.S. DISTRICT COURT
SOUTHERN DISTRICT
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CLERK SD. DIST. OF GA.

FORFEITURE ALLEGATION

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to Title 18, United States Code, Section 1594(d).

Upon conviction of Count One of this Indictment, the defendant **AURELIO MEDINA**, shall forfeit to the United States of America, pursuant to Title 18, 1594(d), any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

If any property subject to forfeiture as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

All pursuant to Title 18, United States Code, Section 1594(b)(2) and 2428, as incorporated by Title 28, United States Code, Section 2461.

A True Bill.



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